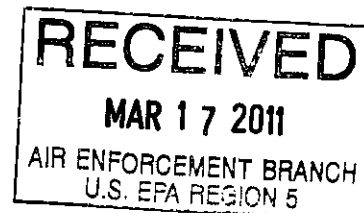




March 15, 2011

Ms. Teresa Seidel
Supervisor, Southeast District Office
MDEQ, Air Quality Division
27700 Donald Court
Warren, Michigan 48092-2793



Subject: Severstal Dearborn, LLC – Annual ROP Certification

Dear Ms. Seidel:

Attached is our annual ROP certification and semi-annual deviation reports for 2010.

Should you need additional information or wish to discuss this matter further, please contact me at (313) 845-3217.

Very truly yours,

A handwritten signature in black ink, appearing to read "J. Earl".

James E. Earl, Manager
Environmental Engineering

Attachments:

ROP Certification
January 1 – June 30, 2010 Deviation Report
July 1 – December 31, 2010 Deviation Report

cc: USEPA, Region 5

Severstal Dearborn
14661 Rotunda Drive
P. O. Box 1699
Dearborn, MI 48120-1699

T: (313) 845-3217
F: (313) 337-9375
E: jim.earl@severstalna.com
www.severstalna.com

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Severstal Dearborn, LLC County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

Please check the appropriate box(es):

☒ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From 01/01/2010 To 12/31/2010

- ☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☒ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☒ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

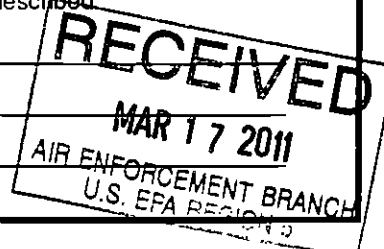
Reporting period (provide inclusive dates): From 07/01/2010 To 12/31/2010

- ☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☐ **Other Report Certification**

Reporting period (provide inclusive dates): From _____ To _____

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

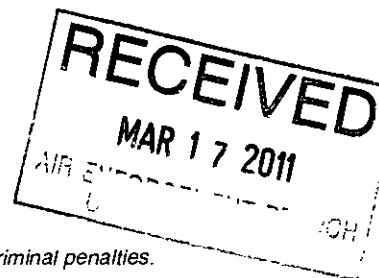


I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Bruce L. Black V.P. and General Manager (313) 317-8955
Name of Responsible Official (print or type) Title Phone Number

B. L. Black 3/10/11
Signature of Responsible Official Date

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
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**RENEWABLE OPERATING PERMIT
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Source Name Severstal Dearborn, LLC County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. III.B.3.1	3. Date(s) of Occurrence Starting 7/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 10/27/10	5. Duration of Deviation 13 weeks
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not conduct weekly visible emission observations of roof monitor. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to perform the visible observations.				

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. V.3	3. Date(s) of Occurrence Starting 7/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 10/27/10	5. Duration of Deviation 92 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Operation and maintenance practices were not utilized on an ongoing basis. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to utilize the operation and maintenance practices.				

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. V.3	3. Date(s) of Occurrence 10/1/10 - 10/26/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date .	5. Duration of Deviation 26 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Operation and maintenance practices were not utilized on an ongoing basis. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to utilize the operation and maintenance practices.				

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. III.B.3.1	3. Date(s) of Occurrence 10/1/10 - 10/26/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 4 weeks
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Did not conduct weekly visible emission observations of roof monitor. See our January 11, 2008 letter to EPA for details.	
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to perform the visible observations.				

1. Group or Source Wide ID FGB&CCASTHOUSE	2. Condition No. III.A.3.1	3. Date(s) of Occurrence 07/01-12/31/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 monthly calculations
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Did not calculate PM-10, manganese, arsenic, and chromium VI emissions by the end of each calendar month from the casthouses.	
8. Reason for Deviation and Description of Corrective Action Taken The calculations for these emissions no longer apply since Permit 182-05B has newer calculations. Permit 182-05B conditions were included in the most recent ROP application.				

1. Group or Source Wide ID EGRAWMATERIALHANDLING	2. Condition No. III.A.2.1	3. Date(s) of Occurrence 07/01/2010-12/31/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 26 readings
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Pressure drop across baghouse was not between 5 and 8 inches w.c. and no appropriate maintenance activity was initiated.	
8. Reason for Deviation and Description of Corrective Action Taken This deviation was voluntary disclosed as an environmental audit finding on March 12, 2009. Normal baghouse differential pressure is less than 5 inches. As allowed in the ROP, a letter to the District supervisor was sent on March 20, 2009 to request a change to the pressure drop range to between 2 and 6 inches w.c.				

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Source Name Severstal Dearborn, LLC County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGCBFBLEEDERS	2. Condition No. II.B	3. Date(s) of Occurrence 07/03/2010	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 10/27/10	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute average opacity was 49% from the C BF bleeders.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during shutdown of furnace. Furnace was shutdown in accordance with our Startup Shutdown and Malfunction plan and shutdown procedures. No root cause has been determined.				

1. Group or Source Wide ID EGCBFBLEEDERS	2. Condition No. II.B	3. Date(s) of Occurrence 07/14/2010	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 10/27/10	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute average opacity was 59% from the C BF bleeders.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during shutdown of furnace. Furnace was shutdown in accordance with our Startup Shutdown and Malfunction plan and shutdown procedures. No root cause has been determined.				

1. Group or Source Wide ID EGCBFBLEEDERS	2. Condition No. II.B	3. Date(s) of Occurrence 08/31/2010	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 10/27/10	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute average opacity was 33% from the C BF bleeders.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during shutdown of furnace. Furnace was shutdown in accordance with our Startup Shutdown and Malfunction plan and shutdown procedures. No root cause has been determined.				

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGCBFBLEEDERS	2. Condition No. II.B	3. Date(s) of Occurrence 12/02/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The highest six minute average opacity was 29% from the C BF bleeders.		
8. Reason for Deviation and Description of Corrective Action Taken Occurred during shutdown of furnace. Furnace was shutdown in accordance with our Startup Shutdown and Malfunction plan and shutdown procedures. No root cause has been determined.				
1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 08/09/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 25% from the BOF Roof Monitors.		
8. Reason for Deviation and Description of Corrective Action Taken Occurred during hot metal charge to vessel. Crane operator charged the vessel too quickly. Operator was informed to slow down pour. The 08/11/2010 reading was below 20% opacity.				
1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 10/11/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 4 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 64% from the BOF Roof Monitors.		
8. Reason for Deviation and Description of Corrective Action Taken occurred during the slag splashing operation on vessel. No root cause was determined. The 10/14/2010 reading was below 20% opacity.				

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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 10/25/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Three minute opacity average was 21% from the BOF Roof Monitors.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during oxygen blow. No root cause was determined.				

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 11/08/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 8 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest three minute opacity average was 53% from the BOF Roof Monitors.	
8. Reason for Deviation and Description of Corrective Action Taken Emissions occurred from the spark box during oxygen blowing. On-going maintenance of the duct work and spark box area to repair leaks. The 11/09/2010 reading was below 20% opacity.				

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 11/22/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest three minute opacity average was 23% from the BOF Roof Monitors.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during oxygen blow when the operator did not add the fluxing agent when required causing the excess emissions. The operator was reinstructed on the proper procedure. The 11/29/10 reading was below 20% opacity.				

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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID General Condition	2. Condition No. 2.a	3. Date(s) of Occurrence 11/08/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute opacity average was 34% from the BOF ESP Stack.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during oxygen blowing. No root cause was determined. The 11/09/2010 reading was below 20% opacity.				

1. Group or Source Wide ID EGCBFCASTHOUSE	2. Condition No. II.B.1	3. Date(s) of Occurrence 10/18/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute opacity average was 21% from the C BF Roof.	
8. Reason for Deviation and Description of Corrective Action Taken The north hole blew hard at end of cast causing excess emissions. Operators were instructed to plug taphole earlier when possible. The 10/20/2010 reading was below 20% opacity.				

1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. III.A.3.2	3. Date(s) of Occurrence December	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 1 monthly inspection
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Did not perform monthly inspection to determine the operational and physical condition of baghouse.	
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in January, 2011.				

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ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGPICKLINSRUBS	2. Condition No. V.3	3. Date(s) of Occurrence 10/23/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 hours
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation South Scrubber water flow rate was below established minimum.	
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				

1. Group or Source Wide ID	2. Condition No.	3. Date(s) of Occurrence	4. Previously reported ? <input type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date	5. Duration of Deviation
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation	
8. Reason for Deviation and Description of Corrective Action Taken				

1. Group or Source Wide ID EGDESULFURWATERING STATION	2. Condition No. II.B	3. Date(s) of Occurrence 09/04/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest three minute opacity average was 22% from Desulf material handling operations.	
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 09/18/2010 reading was below 20% opacity.				

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AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGDESULFURWATERING STATION	2. Condition No. II.B	3. Date(s) of Occurrence 10/16/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest three minute opacity average was 35% from the Desulf material handling operations.	
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 11/02/2010 reading was below 20% opacity.				

1. Group or Source Wide ID EGDESULFURWATERING STATION	2. Condition No. II.B	3. Date(s) of Occurrence 11/27/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest three minute opacity average was 32% from the Desulf material handling operations.	
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 12/07/2010 reading was below 20% opacity.				

1. Group or Source Wide ID EGDESULFWATERINGSTATION	2. Condition No. V	3. Date(s) of Occurrence 8/15-8/27/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 13 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Desulf material was processed outside the BOF building without cooling off material thoroughly with the water spray system.	
8. Reason for Deviation and Description of Corrective Action Taken Due to a crane outage, the desulf material could not be processed at the normal location where the material could be watered. Watering resumed after crane was repaired.				

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RENEWABLE OPERATING PERMIT DEVIATION REPORT

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This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Severstal Dearborn, LLC County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 07/01/10 to 12/31/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID General Condition	2. Condition No. 2.a	3. Date(s) of Occurrence 10/26/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 11/18/10	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation The highest six minute opacity average was %82 from the ESP stack. See our 11/18/10 letter to the MDNRE for details.	
8. Reason for Deviation and Description of Corrective Action Taken Occurred during the shutdown of the #3 ESP ID fan for maintenance. New trial shutdown procedure has been developed.				

1. Group or Source Wide ID EGHCLSTORAGESCRUBBER	2. Condition No. VI.3	3. Date(s) of Occurrence July 1 - December 31, 2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 months
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Did not perform semiannual storage tank inspection.	
8. Reason for Deviation and Description of Corrective Action Taken New personnel were not aware of the inspection requirement. Personnel were trained on requirement.				

1. Group or Source Wide ID EGNO1LRF	2. Condition No. III.A.3.2	3. Date(s) of Occurrence October, November, December	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 monthly inspections
6. Method Used to Determine Compliance Status (if different from method specified in ROP)			7. Description of Deviation Did not perform monthly inspection to determine the operational and physical condition of baghouse.	
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in January, 2011.				

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION**

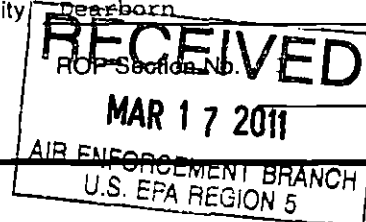
Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(II), and be made available to the Department of Natural Resources and Environment, Air Quality Division upon request.

Source Name Severstal Dearborn, Inc. County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004



Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

- Reporting period (provide inclusive dates): From _____ To _____
- ☐ 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☒ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

- Reporting period (provide inclusive dates): From 01/01/2010 To 06/30/2010
- ☐ 1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☒ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

☐ **Other Report Certification**

Reporting period (provide inclusive dates): From _____ To _____
Additional monitoring reports or other applicable documents required by the ROP are attached as described:

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Bruce L. Black V.P. and General Manager (313) 317-8955
Name of Responsible Official (print or type) Title Phone Number

B L Black 9/15/10
Signature of Responsible Official Date

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
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Source Name Severstal Dearborn, Inc. County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. III.B.3.1	3. Date(s) of Occurrence Starting 1/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 4/13/10	5. Duration of Deviation 13 weeks
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not conduct weekly visible emission observations of roof monitor. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to perform the visible observations.				

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. V.3	3. Date(s) of Occurrence Starting 1/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 4/13/10	5. Duration of Deviation 90 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Operation and maintenance practices were not utilized on an ongoing basis. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to utilize the operation and maintenance practices.				

1. Group or Source Wide ID EGBBFCASTHOUSE	2. Condition No. V.3	3. Date(s) of Occurrence Starting 4/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 7/12/10	5. Duration of Deviation 91 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Operation and maintenance practices were not utilized on an ongoing basis. See our January 11, 2008 letter to EPA for details.		
8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to utilize the operation and maintenance practices.				

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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBBFCSTHOUSE	2. Condition No. III.B.3.1	3. Date(s) of Occurrence Starting 4/1/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 7/12/10	5. Duration of Deviation 13 weeks
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6. Method Used to Determine Compliance Status (if different from method specified in ROP)	7. Description of Deviation Did not conduct weekly visible emission observations of roof monitor. See our January 11, 2008 letter to EPA for details.
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8. Reason for Deviation and Description of Corrective Action Taken Due to an eruption of B Blast Furnace on January 5, 2008, B Blast Furnace has not been in operation and therefore, Severstal was unable to perform the visible observations.
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1. Group or Source Wide ID FGB&CCASTHOUSE	2. Condition No. III.A.3.1	3. Date(s) of Occurrence 01/01-06/30/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 monthly calculations
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6. Method Used to Determine Compliance Status (if different from method specified in ROP)	7. Description of Deviation Did not calculate PM-10, manganese, arsenic, and chromium VI emissions by the end of each calendar month from the casthouses.
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8. Reason for Deviation and Description of Corrective Action Taken The calculations for these emissions no longer apply since Permit 182-05B has newer calculations. Permit 182-05B conditions were included in the most recent ROP application.

1. Group or Source Wide ID EGRAWMATERIALHANDLING	2. Condition No. III.A.2.1	3. Date(s) of Occurrence 01/01/2010-06/30/2010	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 21 readings
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6. Method Used to Determine Compliance Status (if different from method specified in ROP)	7. Description of Deviation Pressure drop across baghouse was not between 5 and 8 inches w.c. and no appropriate maintenance activity was initiated.
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8. Reason for Deviation and Description of Corrective Action Taken This deviation was voluntary disclosed as an environmental audit finding on March 12, 2009. Normal baghouse differential pressure is less than 5 inches. As allowed in the ROP, a letter to the District supervisor was sent on March 20, 2009 to request a change to the pressure drop range to between 2 and 6 inches w.c.
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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGCBFBLEEDERS	2. Condition No. II.B	3. Date(s) of Occurrence 5/19/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 7/12/10	5. Duration of Deviation 12 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The highest six minute average opacity was 37% from the C BF bleeders.		
8. Reason for Deviation and Description of Corrective Action Taken Occurred during shutdown of furnace. Furnace was shutdown in accordance with our Startup Shutdown and Malfunction plan and shutdown procedures. No root cause has been determined.				

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 01/05/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 26% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 01/07/10 reading was below 20% opacity.				

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 01/15/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 29% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 01/21/10 reading was below 20% opacity.				

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ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 02/15/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 36% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 02/16/10 reading was below 20% opacity.				
1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 03/29/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 23% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				
1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 04/05/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 21% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				

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ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217
Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10
Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 01/27/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The highest three minute opacity average was 85% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 02/01/10 reading was below 20% opacity.				

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 06/07/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 36% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 06/09/10 reading was below 20% opacity.				

1. Group or Source Wide ID Table B-1	2. Condition No. III.A.3	3. Date(s) of Occurrence 3/1-3/28/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 4 weekly observations
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation A non-certified visible emission observation was not performed weekly of the storage piles.		
8. Reason for Deviation and Description of Corrective Action Taken New contractor was unaware of storage pile requirement. Contractor was informed of this requirement.				

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Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGPICKLINSRUBS	2. Condition No. VI.1.i	3. Date(s) of Occurrence 4/13/10, 4/29/10, 6/7/10, 6/9/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 12 shifts
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The pressure drop across the scrubbers was not recorded once per shift.		
8. Reason for Deviation and Description of Corrective Action Taken The recording charts for these dates are missing.				

1. Group or Source Wide ID EGHCLSTORAGESCRUBBER	2. Condition No. III.A.2	3. Date(s) of Occurrence 5/13/10, 5/26/10, 6/7/10, 6/28/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 4 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Water flow record was not kept daily.		
8. Reason for Deviation and Description of Corrective Action Taken The recording charts for these dates are missing.				

1. Group or Source Wide ID EGPICKLINSRUBS	2. Condition No. III.A.2	3. Date(s) of Occurrence 6/7/10, 6/9/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 shifts
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The water flow rate was not recorded once per shift.		
8. Reason for Deviation and Description of Corrective Action Taken The recording charts for these dates are missing.				

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ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217
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Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGPICKLINSRUBS	2. Condition No. V.3	3. Date(s) of Occurrence 5/25/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 13 hours
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation North Scrubber water flow rate was below established minimum.		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				

1. Group or Source Wide ID EGPICKLINSRUBS	2. Condition No. V.3	3. Date(s) of Occurrence 5/25/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 17 hours
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation South Scrubber water flow rate was below established minimum.		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				

1. Group or Source Wide ID EGN01LRF	2. Condition No. III.A.3.2	3. Date(s) of Occurrence May	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 1 monthly inspection
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not perform monthly inspection to determine physical condition of baghouse.		
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in June.				

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Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10
Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. III.A.3.2	3. Date(s) of Occurrence March	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 1 monthly inspection
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not perform monthly inspection to determine the operational and physical condition of baghouse.		
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in April.				

1. Group or Source Wide ID EGLADLEREFINE2	2. Condition No. III.A.3.13	3. Date(s) of Occurrence March	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 1 monthly inspection
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not adequately perform monthly inspection to check bag cleaning mechanisms.		
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in April.				

1. Group or Source Wide ID EGNO1LRF	2. Condition No. III.A.3.13	3. Date(s) of Occurrence May	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 1 monthly inspection
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not adequately perform monthly inspection to check bag cleaning mechanisms.		
8. Reason for Deviation and Description of Corrective Action Taken A change in operational schedule did not allow for monthly shutdown to perform the inspection. Baghouse was inspected in June.				

MICHIGAN DEPARTMENT OF NATURAL RESOURCES AND ENVIRONMENT
AIR QUALITY DIVISION

**RENEWABLE OPERATING PERMIT
DEVIATION REPORT**

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

This form may be submitted in conjunction with the Renewable Operating Permit Report Certification form (EQP 5736) to report deviations from all general conditions and special conditions in the Renewable Operating Permit (ROP) for which deviations required to be reported by R 336.1213 (Rule 213) subrule (3)(c) have occurred. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(II), and be made available to the Department of Environmental Quality, Air Quality Division, upon request. Items 1 - 8 must be completed for all deviations being reported.

Source Name Severstal Dearborn, Inc. County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBOF	2. Condition No. III.A.3.6	3. Date(s) of Occurrence January - June	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 4 monthly inspections
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The capture system was not inspected monthly to confirm the physical integrity.		
8. Reason for Deviation and Description of Corrective Action Taken The capture system was inspected quarterly. The Maintenance Work Order will be revised to reflect monthly inspection requirements.				

1. Group or Source Wide ID Appendix 1.9	2. Condition No. C.1.i	3. Date(s) of Occurrence Various	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 20 days
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Did not wet sweep one paved road 5 days a week.		
8. Reason for Deviation and Description of Corrective Action Taken ESP dust loud out road conditions made sweeper operation not possible.				

1. Group or Source Wide ID EGCBFCSTHOUSE	2. Condition No. II.B.1	3. Date(s) of Occurrence 01/27/10	4. Previously reported ? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No If Yes, Date 03/04/10	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The highest six minute opacity average was 56.25% from the C Blast Furnace Roof Monitors. See our 03/04/10 letter to the MDNRE for details.		
8. Reason for Deviation and Description of Corrective Action Taken During casting in the east casthouse, the titling iron runner dampers were not changing position as designed. The analog signal that provides feedback from the iron tilting position, and consequently controlling the dampers, has been repaired.				

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Source Name Severstal Dearborn, Inc. County Wayne

Source Address 4001 Miller Road City Dearborn

AQD Source ID (SRN) A8640 ROP No. 199700004 ROP Section No. 1

ROP Section Contact James E. Earl Contact Phone No. (313) 845-3217

Reporting Period (provide inclusive dates): From 01/01/10 to 06/30/10

Report Type: ☐ Annual ☒ Semi Annual ☐ Other (Describe) _____

1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 03/31/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If Yes, Date	5. Duration of Deviation 6 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation The highest three minute opacity average was 36% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined.				
1. Group or Source Wide ID EGBOF	2. Condition No. II.B.2	3. Date(s) of Occurrence 04/12/10	4. Previously reported ? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	5. Duration of Deviation 3 minutes
6. Method Used to Determine Compliance Status (if different from method specified in ROP)		7. Description of Deviation Three minute opacity average was 31% from the BOF Roof Monitors		
8. Reason for Deviation and Description of Corrective Action Taken No root cause was determined. The 04/19/10 reading was below 20% opacity.				